

12 | VIDEO DEPOSITION OF CHRIS GALLY

13 ATTORNEYS' EYES ONLY

14 | March 20, 2013

16 | Reported by: Anne Torreano, CSR No. 10520

1       this: When you were reviewing your declaration earlier  
2       in answer to my questions, were you able to identify or  
3       did you see any sentences in it that you believe that  
4       you initially wrote in the first instance?

03:54:31   5       A.     I don't remember.

6       Q.     Okay. My next question to you is kind of like  
7       a same follow-up kind of question, which is, in  
8       reviewing documents with your attorney in preparation  
9       for this deposition, did any of the documents that you  
03:54:51 10      looked at help you remember something that you  
11      testified about today?

12     A.     Say that one more time, please.

13     Q.     It's terrible, isn't it?

14     A.     Yeah.

03:55:04 15     Q.     Did any of the documents that you looked at  
16     yesterday with Mr. Kiernan help you remember something  
17     that you testified about today?

18     A.     Yes.

19     Q.     Okay. What documents helped you remember  
03:55:13 20     something that you testified about?

21           I don't want to go through that pile. Is it  
22     all stuff that you saw here again today?

23     A.     Yes.

24     Q.     Okay. Is there anything that you looked at  
03:55:30 25     with him that helped you remember something that you

1 testified about that I didn't show you today?

2 A. Not -- no.

3 MR. GLACKIN: Okay. That's it. No further  
4 questions.

03:55:45 5 MR. KIERNAN: I think I just have a couple.

6 We don't need to switch. Some people make me.

7 MR. GLACKIN: I don't care where you sit.

8 MR. KIERNAN: I know. Exactly. But you can  
9 keep looking at the --

03:55:56 10 THE WITNESS: Okay.

11 MR. KIERNAN: -- camera, as bizarre as that  
12 may be.

13 EXAMINATION

14 BY MR. KIERNAN:

03:55:59 15 Q. [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

1

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1 [REDACTED]

12 Q. Okay. And then do you recall we had some  
13 discussion today about your views of internal equity?

14 A. Yes.

03:58:24 15 Q. Do you recall that? Okay.

16 [REDACTED]

[REDACTED]

[REDACTED]

03:58:39 20 Do you recall that?

21 A. I do.

22 MR. GLACKIN: Object to the form.

23 MR. KIERNAN: Okay. You object to the form of  
24 whether he recalls saying that?

03:58:45 25 MR. GLACKIN: It's leading. You should just

1 ask him the question. And I also am not sure that  
2 that's -- I'm not completely confident that's exactly  
3 what he said.

4 BY MR. KIERNAN:

03:58:52 5 Q. Okay. Well, let me ask.

6 Do you recall that?

7 A. I do recall.

8 Q. Okay. What did you mean by that?

9 MR. GLACKIN: Object to the form.

03:59:03 10 THE WITNESS: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

22 BY MR. KIERNAN:

23 Q. [REDACTED] [REDACTED]

[REDACTED]  
[REDACTED]

## 1 REPORTER'S CERTIFICATE

2 I, Anne Torreano, Certified Shorthand Reporter  
3 licensed in the State of California, License No. 10520,  
4 hereby certify that the deponent was by me first duly  
5 sworn, and the foregoing testimony was reported by me  
6 and was thereafter transcribed with computer-aided  
7 transcription; that the foregoing is a full, complete,  
8 and true record of said proceedings.

9 I further certify that I am not of counsel or  
10 attorney for either or any of the parties in the  
11 foregoing proceeding and caption named or in any way  
12 interested in the outcome of the cause in said caption.

13 The dismantling, unsealing, or unbinding of  
14 the original transcript will render the reporter's  
15 certificates null and void.

16 In witness whereof, I have subscribed my name  
17 this 1st day of April, 2013.

18  
19 [X] Reading and Signing was requested.  
20 [ ] Reading and Signing was waived.

21 [ ] Reading and Signing was not requested.  
22  
23

24 ANNE M. TORREANO, CSR No. 10520

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